

## **REMARKS/ARGUMENTS**

### **I. Concerning the Amendments**

The specification is amended at page 6 to correct a clear typographical error relating to the units used to express dry coatweight. Dry coatweight is expressed using the units  $\text{g/m}^2$  throughout the remainder of the specification and the claims. Claims 72-74 are also amended to correct a typographical error.

Claims 1 and 30 are amended to specify a web velocity of at least 600 m/min., which is not disclosed in the prior art in connection with the preparation of coated substrates using a curtain containing reactive components. These amendments are supported in the specification in the first paragraph of page 16. Claims 27, 49, 58 and 63 are cancelled in view of the fact that they no longer further limit the claims from which they depend. Claims 1 and 30 are further amended to specify that the solids content of the curtain is at least about 45 weight percent. Support for this amendment is found in the specification in the last paragraph of page 14. The amendments and new Claims 75-80 are presented in response to new arguments in the latest Office Action. The amendments to Claims 75-79 are supported at page 16 of the specification, and the amendment to Claim 80 is supported at pages 14, line 26, and 16, line 6, and by original Claims 1, 25, and 67. No new matter is presented by these amendments.

### **II. Concerning the Rejection over Prior Art**

All pending claims stand rejected as obvious over Yokota in view of secondary references including Schweizer, and/or additional references. Applicants note that the application of the combination of Yokota and Schweizer as applied to, e.g., Claim 1, is a new rejection, as in the prior Office Action this combination of references was only applied to Claims 27, 49, 54-64 and 68. Accordingly, withdrawal of the "final" status of the latest Office Action is requested.

Examiner argues Schweizer teaches coating speeds of up to 1800 m/min with up to 10 layers. However, references relied upon to support a rejection must provide an enabling disclosure, i.e. they must place the invention in the possession of the public. Applicants position is that Schweizer does not enable one skilled in the art to operate *at Applicants claimed conditions*.

Examiner cites Schweizer for teaching that simultaneous multilayer curtain coating is well known, and cites Hughes and Yokota '884 as references as evidence that Schweizer is enabling. Applicants note, however, that Hughes is not cited as a basis of rejection, i.e. there is no rejection of the claims as being obvious over Yokota in view of Schweizer and Hughes.

Even if Hughes is added to the list of references supporting this rejection, Applicants have stated that coatings have been prepared via simultaneous multilayer curtain coating when using low viscosity and low solids content photographic coating compositions; see Applicants' specification at page 4, lines 24 et seq., citing, e.g. Hughes. Example 2 of Hughes is the example showing the highest coating speed, and it teaches simultaneous 2-layer coating of low solids, low viscosity photographic emulsions at a substrate speed of 1,000 cm/sec (600 m/min.). Applicants' claims specify that the solids content of the curtain be at least about 45 weight percent. This is far higher than the solids of the curtain of Hughes.

Yokota teaches multilayer coating but at low speed (200 m/min and lower).

Many problems are known in the art of coating with high solids curtains, i.e. it is not a trivial matter to modify the process of Hughes by raising the solids. See, e.g. U.S. Patent 5,447,753. Increasing the coating speed and the solids content merely exacerbates these known problems.

Thus, neither Hughes nor Yokota support the premise that Schweizer enables the skilled artisan to practice a high speed, high solids, multilayer curtain coating process as claimed by Applicants.

Applicants maintain that Schweizer does not enable the skilled artisan to practice a high speed, high solids, multilayer curtain coating process as claimed by Applicants. The Schweizer article itself contains no examples or other teaching as to how one would practice high speed, high solids, multilayer curtain coating. While Examiner would rely on Table 1 of Schweizer, Schweizer at page 4 states: "The premetered processes like all other coating processes are subject to certain limits. An exact quantification of these limits is impossible, because it always depends on numerous relevant process parameters. Caution should therefore be used in interpreting Table 1." (Emphasis supplied.) Not only does Schweizer not contain any examples, it warns the reader that the contents of Table 1 are somewhat speculative.

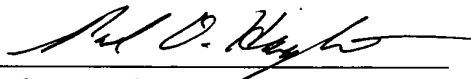
The teachings of Schweizer cover a broad range of applications. Thus, some of the conditions contained in Table 1 of Schweizer relate to low solids coating. Perhaps Schweizer could be seen as enabling for low solids coating at high speed, but it is clear that Schweizer does not enable the high solids coating process claimed in the present application.

Applicants maintain that Schweizer does not enable high solids, high speed, curtain coating as claimed by Applicants. Schweizer gives no examples of such a process. While Examiner would combine Schweizer with Yokota, Yokota is also deficient in that it does not teach or suggest high speed coating. Hughes, not used as a basis of rejection, is directed to coating with low solids and thus does not provide any teaching regarding a high solids, high speed, curtain coating process. For the foregoing reasons, reconsideration of all rejections is requested.

### III. Conclusion

Reconsideration of the claims and passing of the application to allowance are solicited.

Respectfully submitted,



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